

Commissioners:

Shortly after September 11, 2001, I volunteered at potential risk to myself to go and provide radio communication services in support of the Red Cross at IS-89 within a couple of hundred yards of the pile of rubble that was the Trade Towers.

While the actual risk appears to have been minimal, I could not have known this at the time. As an experienced amateur radio operator, having worked in natural and man made disasters before, I felt an obligation to do what I must.

You have an obligation as well. Your obligation is to protect those services which are licensed from those operating under Part 15. Your job is not to relax those requirements leading to the destruction of the licensed services.

Irrespective of what speeches the President of the United States has recently given and you the commissioners have recently been responsible for, you cannot substitute political pressure and undo outside influence for facts.

The facts are that every case of BPL used outside of the US has gone poorly. The facts are that it is very hard to believe power company claims that they are going to provide broadband to rural customers when these rural customers are at a density of under one person per square mile. The cost to the utilities would have to be prohibitive. This is clearly an opening for power companies to introduce this technology in already served metropolitan areas in competition to the already competitive, multiple services in those urban areas. I cannot understand why you are not urging the use of large area wireless access networks with gain antennas for the end users if necessary. Certainly the infrastructure required would be significantly less than rewiring the entire electric grid of our more rural states.

The facts have been clearly and repeatedly demonstrated to you on multiple occasions that BPL can and does cause harmful interference to many shortwave services. Power lines are not transmission lines, they are clearly antennas.

I have on more than one occasion, been heard around the world with less than 1 watt. In a recent operating event for radio amateurs, I used less than 5 watts of power from my transmitter to make hundreds of contacts in a forty-eight period with stations from all over the world.

My effective radiated power at the aforementioned power levels, produces comparable field strength from my antennas as recently measured by me, to the field strengths I have measured from your test cases for BPL in the town of Potomac, Md. at a distance nearly equal to the distance from my own antennas in multiple amateur radio bands. BPL transmissions from their electric grid antennas will be heard around the world. Were it not for the fact that we are in a low of the sunspot cycle, they would be heard around the world now at various times.

I started to provide a detailed explanation of my tests and documentation but it appears that the FCC is completely uninterested in the facts. With the President of the United State delivering speeches calling for

an end to protection of licensed services and those recently made by commissioners in clear abrogation of their public duty, I view this as moot. I urge you to reconsider and do your duty as I do. Protect those existing services that provide daily services for the good of our nation and the world from the unproven and incorrect BPL technology for the job you seem to wish it to do.

Respectfully submitted,  
Dr. Robert W. McGwier  
ARS N4HY